

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

OPAL CHABRIER, DONALD LAMUTIS	:	CIVIL ACTION NO. 06-4176
and STEVEN TURNER, individually and	:	
on behalf of all others similarly situated,	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
WILMINGTON FINANCE, INC.,	:	
	:	
Defendant.	:	

**STIPULATION OF EXTENSION OF COUNSEL REGARDING PLAINTIFFS'
MOTION TO COMPEL ELECTRONIC DISCOVERY**

Plaintiffs Opal Chabrier, Donald Lamutis and Steven Turner and Defendant
Wilmington Finance, Inc., by their undersigned counsel, hereby stipulate that they are
attempting to resolve the issues raised in Plaintiffs' Motion to Compel Electronic Discovery
and agree that the time within which Defendant Wilmington Finance, Inc. may respond to that
Motion be extended up to and including January 18, 2008.

On December 18, 2007, Plaintiffs filed their Motion to Compel Electronic Discovery,
(D.E. 144). On January 5, 2008, at the parties request, the Court entered an Order granting
Defendant until January 11, 2008 to respond to Plaintiffs' Motions to Compel.

Accordingly, the parties request the Court extend the time within which Defendant may respond to Plaintiffs' Motion to Compel Electronic Discovery up to and including January 18, 2008.

/s/ Shanon J. Carson
Jonathan D. Berger, Esquire
Russell D. Henkin, Esquire
Shanon J. Carson, Esquire
Berger & Montague, P.C.
1622 Locust Street
Philadelphia, PA 19103
215.875.4656
215.875.4674 (fax)
jdberger@bm.net
rhenkin@bm.net
scarson@bm.net

Attorneys for Plaintiffs

Dated: January 11, 2008

/s/ James N. Boudreau
James N. Boudreau, Esquire
Michele Halgas Malloy, Esquire
Christina T. Winston, Esquire
Littler Mendelson, P.C.
Three Parkway
1601 Cherry Street, Suite 1400
Philadelphia, PA 19102
267.402.3000
267.402.3131 (fax)
jboudreau@littler.com
mmalloy@littler.com
twinston@littler.com

Attorneys for Defendant

SO ORDERED: January __, 2008

Norma L. Shapiro, J.

CERTIFICATE OF SERVICE

I, James N. Boudreau, Esquire, hereby certify that I caused a true and correct copy of the foregoing **Stipulation of Extension of Time to Respond to Plaintiffs' Motion to Compel Electronic Discovery** to be served as follows:

Via Electronic Mail:

Daniel K. Touhy, Esquire
Touhy & Touhy, Ltd.
161 North Clark Street
Suite 2210
Chicago, IL 60601

Shanon J. Carson, Esquire
Berger & Montague
1622 Locust Street
Philadelphia, PA 19103

Danny Cevallos, Esquire
Law Offices of Daniel L. Cevallos, P.C.
1420 Locust Street, Suite 24Q
Philadelphia, PA 19102

/s/ James N. Boudreau

James N. Boudreau

January 11, 2008